

WHEN RECORDED MAIL TO:

Arizona Attorney General's Office
Financial Remedies Section
Kenneth R. Hughes
2005 N. Central Ave.
Phoenix, AZ 85004

Petersen-15-1-1--
Hoyp

THIS SPACE RESERVED FOR RECORDING INFORMATION

NOTICE OF SEIZURE FOR FORFEITURE

The following real property is hereby seized for forfeiture pursuant to the attached seizure warrant (SW2019-020041) and A.R.S. § 13-4305:

- 5.1** The real property, fixtures, and improvements located at 860 E BROWN RD #29 MESA, AZ 85203.
Owner: PETERSEN REVOCABLE LIVING TRUST
Parcel No.: 137-09-321
Description: LOT 1, RE-PLAT OF SUN GARDENS, ACCORDING TO BOOK 620 OF MAPS, PAGE 30, RECORDS OF MARICOPA COUNTY, ARIZONA.
- 5.2** The real property, fixtures, and improvements located at 634 N MIRAMAR MESA, AZ 85213.
Owner: PETERSEN REVOCABLE LIVING TRUST
Parcel No.: 140-12-294
Description: LOT 13, HIDDEN GROVES, ACCORDING TO THE PLAT OF RECORD IN THE OFFICE OF THE COUNTY RECORDER OF MARICOPA COUNTY, ARIZONA, RECORDED IN BOOK 475 OF MAPS, PAGE 3.
- 5.3** The real property, fixtures, and improvements located at 37 N HIBBERT MESA, AZ 85201.
Owner: LAW OFFICE OF PAUL D PETERSEN PLLC
Parcel No.: 138-64-007
Description: The South 50 feet of the North 135 feet of the West 150 feet of Lot 4, Block 34, of MESA CITY, ARIZONA according to the plat of record in the office of the County Recorder of Maricopa County, Arizona, recorded in Book 3 of Maps, Page 11.

Note: Said property is described as above shown on the plat of MESA recorded in the office of the County Recorder of Maricopa County, Arizona, recorded in Book 23 of Maps, Page 18.

5.4 The real property, fixtures, and improvements located at 4156 BLUE SPRUCE DR., PINETOP, AZ 85935.

Owner: PETERSEN REVOCABLE LIVING TRUST

Parcel No./Tax ID: 411-45-012

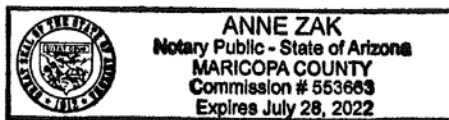
Description: LOT TWELVE (12), WHITE MOUNTAIN SUMMER HOMES SUBDIVISION, ACCORDING TO THE PLAT OF RECORD IN BOOK 9 OF PLATS, PAGES 22, 23, 24, IN THE OFFICE OF THE COUNTY RECORDER AT NAVAJO COUNTY, ARIZONA.

SAVAJO COUNTY, ARIZONA.

Samuel Hunt
Detective
Arizona Department of Public Safety

State of Arizona)
County of Maricopa)

The foregoing instrument was acknowledged before me this 19 day of November, 2019, by Samuel Hunt, Detective with the Arizona Department of Public Safety.



Anne Zak
Notary Public

CERTIFIED COPY

CLERK OF THE SUPERIOR COURT
FILEDNOV 19 2019 11:00 a.m.
D. McGraw, Deputy

MARK BRNOVICH
 Attorney General (Firm State Bar No. 14000)
 Kenneth R. Hughes (State Bar No. 028274)
 Assistant Attorneys General
 Financial Remedies Section
 2005 N. Central Ave.
 Phoenix, AZ 85004
 Telephone: (602) 542-7930
 Attorneys for the State
 CRMRacketeering@azag.gov
 #8343096

IN THE SUPERIOR COURT OF ARIZONA
 MARICOPA COUNTY

STATE OF ARIZONA, *ex rel.* MARK
 BRNOVICH, Attorney General,

Plaintiff,

v.

PAUL D. PETERSEN and his marital
 community; LAW OFFICE OF PAUL D.
 PETERSEN, PLLC, an Arizona professional
 limited liability company; BRIGHT STAR
 ADOPTIONS, LLC, an Arizona limited liability
 company;

AND

THE PROPERTY DESCRIBED IN APPENDIX
 ONE ATTACHED TO THE SEIZURE
 WARRANT;

Defendants.

No. SW2019-020041

SEIZURE WARRANT

IN PERSONAM AND IN REM

Upon application by the State pursuant to A.R.S. §§ 13-2314 and 13-4301
 through 13-4315, the Court hereby finds, based upon the accompanying affidavit and
 any further facts sworn to before me this day, probable cause to believe the following:

1 A. Unlawful conduct giving rise to forfeiture has been committed by PAUL
2 D. PETERSEN; LAW OFFICE OF PAUL D. PETERSEN, PLLC; BRIGHT STAR
3 ADOPTIONS, LLC; or their agents, individually and as part of an illegal enterprise, in
4 violation of one or more of the following statutes:

- 5 • A.R.S. § 13-2310 (fraudulent schemes and artifices);
- 6 • A.R.S. § 13-13-2311 (fraudulent schemes and practices);
- 7 • A.R.S. § 13-1802 (theft);
- 8 • A.R.S. § 13-2002 (forgery); or
- 9 • A.R.S. § 13-1003 (conspiracy).

10 B. The persons named above, individually and as part of an alleged
11 conspiracy and illegal enterprise: acquired or maintained property or an interest in
12 property in violation of A.R.S. § 13-2312; or received proceeds traceable to, or benefits
13 derived from, a racketeering offense; or used or intended to use property, in any manner
14 or part, to facilitate the commission of a racketeering offense.

15 C. The persons named above obtained proceeds or used property worth
16 \$1,459,578 in connection with one or more of the offenses listed above. Pursuant to
17 A.R.S. §§ 13-2314(D)(6)(d) or 13-4313(A), all property up to the value of \$1,459,578
18 owned by the persons described above, individually or by their marital communities, is
19 subject to seizure for forfeiture.

20 D. The property described in Appendix One is subject to seizure and
21 forfeiture pursuant to A.R.S. §§ 13-2314, 13-4304, or 13-4313(A).

22 E. The issuance of a seizure warrant ordering the seizure for forfeiture of
23 that property is appropriate and authorized by A.R.S. §§ 13-2314(C), 13-4305, and 13-
24 4310(A).

1 **IT IS THEREFORE ORDERED THAT:**

2 1. The persons named in Paragraph A above, and/or their employees and
3 agents are further ordered, pursuant to A.R.S. §§ 13-2314(C) and 13-4310(A), to give
4 notice and a copy of this Seizure Warrant, immediately, to all of their agents,
5 accountants, attorneys, securities intermediaries, bailees, banks, debtors, and any person
6 holding or in control of property in which they are an owner or interest holder. **All**
7 **persons provided with or with knowledge of this Seizure Warrant are ordered not**
8 **to convey, alienate, encumber, dispose of, remove from the State of Arizona,**
9 **conceal, or otherwise render any property described in Appendix One unavailable**
10 **for forfeiture.**

11 2. The persons named in Paragraph A above, individually and their marital
12 communities, and/or their employees and agents, are further ordered, pursuant to A.R.S.
13 §§ 13-2314(C) and 13-4310(A), to direct, immediately, their agents, accountants,
14 attorneys, securities intermediaries, bailees, banks, debtors, and any person holding or
15 in control of money or other property subject to seizure for forfeiture under this Seizure
16 Warrant in which he is an owner or interest holder, to pay over such monies or other
17 property to the Attorney General's Office as though in the custody of this court, as
18 payee, and shall refer to the number of this Seizure Warrant with each such payment.
19 All payments shall be sent to the Attorney General's Office, Seized Property Manager,
20 Financial Remedies Section, as directed in paragraphs 7 and 8 below, for recordkeeping
21 and depositing.

22 3. Any peace officer in the State of Arizona shall seize the property described
23 in Appendix One hereto for forfeiture pursuant to A.R.S. §§ 13-4301-4315 and 13-2314
24 by any means provided in A.R.S. § 13-4306. Pursuant to A.R.S. § 13-4306(G), an owner
25 of property seized for forfeiture under this Seizure Warrant may obtain the release of the
26 seized property by posting with the Attorney for the State a bond, by surety or cash, in
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1 an amount equal to the full fair market value of the property, as determined by the
2 Attorney for the State. The bond, including interest, will be substituted for the property
3 in all respects as applicable.

4 4. Pursuant to A.R.S. § 13-4306(D), any person who acts in good faith and
5 in a reasonable manner to comply with this order or with a request of a peace officer
6 serving this warrant is not liable to any person for acts done in compliance with this
7 warrant or with the peace officer's request.

8 5. As soon as practicable after seizure for forfeiture, the seizing agency shall
9 conduct an inventory, estimate the value of the property seized, and submit it to the
10 Attorney for the State.

11 6. Property seized pursuant to this warrant may be seized by constructive
12 seizure if the seizing agency determines that constructive seizure is reasonably certain to
13 preserve the property for forfeiture. This paragraph does not apply to property being
14 seized as evidence.

15 7. Upon presentation of this Seizure Warrant, all property described in
16 Appendix One is now under the custody and control of the Court. Any person in
17 possession or control of said property shall immediately allow the peace officer serving
18 this Seizure Warrant to take possession or control of said property, together with its
19 keys, equipment, manuals, and any other item facilitating its use. If any of the property
20 is a negotiable instrument, a debt, or an account, said person shall prepare a cashier's
21 check or like instrument in the amount of the account balance as of the time of service
22 upon them of this Seizure Warrant, including all principal and interest and any deposits
23 subsequently made, payable to the Attorney General's Office. In the event that a check
24 cannot be prepared immediately and turned over to the presenting peace officer
25 forthwith, it shall be prepared and delivered as soon as soon as possible to the **Attorney**
26 **General's Office, Seized Property Manager, Financial Remedies Section, 2005 N.**

1 **Central Ave., Phoenix, AZ 85004. A separate check shall be prepared for each**
2 **account.**

3 8. The following information shall be provided in writing to the peace
4 officer or to the Attorney General's Office when account proceeds are delivered:

- 5 a. Name(s) of account owner(s) of each account
- 6 b. Account number of each account
- 7 c. Amount of account proceeds seized in connection with each
8 account, by account number
- 9 c. Date of delivery of account proceeds.

10 9. Any deposit subsequently made to an account described in Appendix One
11 is subject to this Seizure Warrant when deposited and subject to each of its provisions.

12 10. If property seized under this Seizure Warrant consists of cash or a
13 negotiable instrument, the seizing agency or the Attorney General's Office shall deposit
14 the funds in an interest-bearing account, unless needed as evidence. The deposit may be
15 at any financial institution selected by the seizing agency or the Attorney General's
16 Office.

17 11. Any person in possession of records or information relating to the source,
18 use, or ownership of any of the property described in Appendix One shall, at no cost to
19 themselves, produce such records or information for inspection or copying by the peace
20 officer executing this Seizure Warrant.

21 12. If properties described in Appendix One are contained within a safe
22 deposit box or vault box, the financial institution or commercial vault company is
23 ordered to prohibit access to the safe deposit box/vault box except to the seizing agency
24 executing this Seizure Warrant. The institution/company is further directed to drill the
25 safe deposit box/vault box if necessary to allow immediate access and release the
26 contents to the officer serving this Seizure Warrant. The officer shall inventory the
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1 contents of each safe deposit box/vault box, shall permit a representative of the
2 institution/company to be present for the inventory, and shall leave a written receipt in
3 each safe deposit box and with the institution/company.

4 13. Any debtor or trustee whose obligation is described in Appendix One, and
5 any insurer of property described in Appendix One who becomes liable to any person
6 by reason of insurance relating to the property, shall make all payments of principal and
7 interest due on the obligation or insurance after service upon them of this Seizure
8 Warrant payable to the Attorney General's Office, and shall refer to the number of this
9 Seizure Warrant with each such payment. All payments are under the custody and
10 control of the Court, and shall be sent to the **Attorney General's Office, Seized**
11 **Property Manager, Financial Remedies Section**, as directed in paragraphs 7 and 8
12 above, for recordkeeping and depositing. Payments shall be on the same terms and
13 conditions in existence at the time of service of this Seizure Warrant.

14 14. The seizing agency and the Attorney General's Office shall identify all
15 funds seized pursuant to this Seizure Warrant to this Seizure Warrant number, and shall
16 maintain such funds in interest-bearing accounts/subaccounts or investments, as though
17 in the custody of this Court, and retain them in the constructive custody of the seizing
18 agency or Attorney General's Office by keeping both principal and interest identifiable
19 and available for further order of this Court.

20 15. In addition to or in lieu of taking possession of any vehicle or boat which
21 is subject to forfeiture, a peace officer may seize a vehicle or boat registered in Arizona
22 constructively by serving the appropriate agency (the Motor Vehicle Division (MVD)
23 of the Department of Transportation for vehicles and the Game and Fish Department for
24 boats), with written notice that the property has been seized for forfeiture. A pending
25 forfeiture lien shall be entered on the agency's records upon receipt of the notice, and
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1 thereafter no interest described in the prescribed notice shall be transferred,
2 encumbered, or valid against the State.

3 16. If property taken into actual custody pursuant to this Seizure Warrant
4 includes property that is not subject to forfeiture and is not contraband, the seizing
5 agency shall tender the non-forfeitable property to the person in possession at the time
6 of the seizure, subject to any other order of the Court. If no known person was in
7 possession at the time the seizing agency acquired possession of the non-forfeitable
8 property, it shall be removed for safekeeping and returned to an owner or interest holder
9 establishing their right to possession, upon request and indemnification of the seizing
10 agency for possible damages in the event of a mistaken delivery.

11 17. All real property described in Appendix One shall be seized
12 constructively by filing the Seizure Warrant, Notice of Pending Forfeiture, or Notice of
13 Seizure for Forfeiture with any appropriate office maintaining public records relating to
14 the property. Notice of seizure may also be made by posting a copy of the Seizure
15 Warrant, Notice of Pending Forfeiture, or Notice of Seizure for Forfeiture on the
16 property in a conspicuous location. The seizure of real property constructively does not
17 affect its occupancy or use, except as follows. Pursuant to A.R.S. § 13-4310(A) and for
18 the purpose of preserving the rights of owners and interest holders and the State, the
19 persons named in Paragraph A above, individually and/or their marital communities,
20 are hereby designated custodians of their seized real property. As custodians, they are
21 responsible to:

22 a. Care for and manage the property prudently so as to maintain its
23 present value and its income generating capacity and profitability, if any;

24 b. Make timely payments to all interest holders, including lien
25 holders, make timely payment of all taxes on the property, and make timely payments
26 on all insurance payments, adding the Attorney General's Office as a loss payee;

1 c. Preserve the property from waste, neglect, destruction, or damage
2 by taking reasonably necessary measures, such as providing for workmen, repairmen,
3 utilities, and security measures;

4 d. Provide reasonable verification of continuing compliance to the
5 Attorney General's Seized Property Manager by producing records of relevant
6 payments for inspection and copying upon request, and by arranging physical access to
7 assess the premises upon written request at least three business days in advance of any
8 visit, unless the custodian applies to the Court for a protective order preventing
9 inspection, copying, or physical access; and

10 e. Pay rent to the State for the period of their occupancy after service
11 of this Seizure Warrant if, and only if, the State prevails in the forfeiture of the
12 property. The rent will be in the amount of the fair market rent for like premises, as
13 determined by the Court, and will be due in full upon final order of forfeiture. Amounts
14 paid under subparagraph b., above, that maintain or increase the value of the premises,
15 will be credited to the rents due under this paragraph.

16 18. Each person who wants to receive future notice regarding any seized
17 property shall notify the State in writing of their preferred address by sending certified
18 mail, return receipt requested, to the address of the attorney for the State set forth on the
19 first page of this Seizure Warrant.

20 19. Any person who is appointed custodian of seized real property or who is
21 an owner or interest holder in real property under the terms of this Seizure Warrant may
22 file an application to this Court seeking modification of the terms of the judicially-
23 ordered custodianship described herein. The application shall be served upon the
24 Attorney for the State and on all other persons known to have an interest in the real
25 property, shall specify the reasons for the modifications sought and shall set forth the
26 proposed language of the modification. Upon receipt of the application this Court will

1 set an expedited hearing on the application within ten days, allowing time for the
2 persons with interests in the real property, including the Attorney for the State, to
3 consider entering into a stipulation with the custodian or other person whose real
4 property is seized regarding the proposed modification.

5 20. The seizing agency may make return of this Warrant by filing with the
6 Clerk of the Court a Notice of Pending Forfeiture or Verified Complaint.

7 21. The *Application for Seizure Warrant* and *Affidavit* filed in support of this
8 Seizure Warrant are hereby sealed. The seizing agency or the Attorney for the State
9 may provide these documents to a person with an interest in seized property or his or
10 her attorney.

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12 SO ORDERED this 19th day of November, 2019.

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16 Hon. Patricia Starr
17 Maricopa County Superior Court
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APPENDIX ONE

The property described below is subject to seizure for forfeiture:

1. **In Personam:**

All real and personal property interests having a fair market value up to **\$1,459,578** (less liens and encumbrances) owned by, belonging to or held for the benefit of any of the following entities, companies or persons; their marital communities; and all related entities, businesses or enterprises:

1.1. PAUL D. PETERSEN

1.2. LAW OFFICE OF PAUL D. PETERSEN, PLLC

1.3. BRIGHT STAR ADOPTIONS, LLC

2. **U.S. or other Currency, In Personam and/or In Rem:**

All U.S. or other Currency in any form up to the value of **\$1,459,578**, owned by, belonging to, or held for the benefit of the entities, companies or persons listed under **Item 1** above and their marital communities.

3. **Financial Institution Accounts, In Personam and/or In Rem:**

All bank or financial accounts of any kind (including savings, equity, and investment accounts) and the contents of any safe deposit boxes up to the value of **\$1,459,578**, owned by, belonging to, or held for the benefit of the entities, companies or persons listed under **Item 1** above. This includes, but is not limited to, the following identified accounts:

3.1 Arizona Federal account no. XXXXXX2106, held in the name of Paul Petersen.

3.2 American Express account nos. XXXXXX3549 and XXXXXX2019, held in the name of Paul Petersen.

3.3 American Express Rewards Points, held in the name of Paul Petersen or Law Office of Paul D Petersen PLLC.

3.4 Bank of America account nos. XXXXXX1835 and XXXXXX9762, held in the name of Law Office of Paul D Petersen PLLC.

3.5 BBVA account nos. XXXXXX2943, XXXXXX3092, and XXXXXX5744, held in the name of Law Office of Paul D Petersen PLLC.

3.6 BBVA account no. XXXXXX7918, held in the name of Paul Petersen and Raquel Petersen.

- 1 3.7 BBVA account no. XXXXXX5744, held in the name of Bright Star Adoptions,
LLC.
- 2 3.8 Chase Bank account no. XXXXXX3717, held in the name of Law Office of
3 Paul D Petersen PLLC.
- 4 3.9 Chase Bank account no. XXXXXX8763, held in the name of Bright Star
5 Adoptions, LLC.
- 6 3.10 Fidelity account nos. XXXXXX3459 and XXXXXX3879 held in the name of
7 Paul D Petersen and Raquel Petersen.
- 8 3.11 Wells Fargo account nos. XXXXXX4930 and XXXXXX9292, held in the name
9 of Paul D Petersen.

10 **4. Vehicles, In Personam and/or In Rem:**

11 All vehicles up to the value of **\$1,459,578**, owned by, belonging to, or held for
12 the benefit of the entities, companies or persons listed under **Item 1** above and
their marital communities.

13 **5. Real Property, In Personam and/or In Rem:**

14 All real property and improvements up to the value of **\$1,459,578**, owned by,
15 belonging to, or held for the benefit of the entities, companies or persons listed
in **Item 1** above and their marital communities.

- 16 5.1 The real property, fixtures, and improvements located at 860 E BROWN
17 RD #29 MESA, AZ 85203.

18 **Owner:** PETERSEN REVOCABLE LIVING TRUST

19 **Parcel No.:** 137-09-321

20 **Description:** LOT 1, RE-PLAT OF SUN GARDENS, ACCORDING TO
BOOK 620 OF MAPS, PAGE 30, RECORDS OF MARICOPA
COUNTY, ARIZONA.

- 21 5.2 The real property, fixtures, and improvements located at 634 N
22 MIRAMAR MESA, AZ 85213.

23 **Owner:** PETERSEN REVOCABLE LIVING TRUST

24 **Parcel No.:** 140-12-294

25 **Description:** LOT 13, HIDDEN GROVES, ACCORDING TO THE
26 PLAT OF RECORD IN THE OFFICE OF THE COUNTY RECORDER
27 OF MARICOPA COUNTY, ARIZONA, RECORDED IN BOOK 475
28 OF MAPS, PAGE 3.

1 **5.3** The real property, fixtures, and improvements located at 37 N HIBBERT
2 MESA, AZ 85201.

3 **Owner:** LAW OFFICE OF PAUL D PETERSEN PLLC

4 **Parcel No.:** 138-64-007

5 **Description:** The South 50 feet of the North 135 feet of the West 150 feet
6 of Lot 4, Block 34, of MESA CITY, ARIZONA according to the plat of
7 record in the office of the County Recorder of Maricopa County, Arizona,
8 recorded in Book 3 of Maps, Page 11.

9 Note: Said property is described as above shown on the plat of MESA
10 recorded in the office of the County Recorder of Maricopa County,
11 Arizona, recorded in Book 23 of Maps, Page 18.

12 **5.4** The real property, fixtures, and improvements located at 4156 BLUE
13 SPRUCE DR., PINETOP, AZ 85935.

14 **Owner:** PETERSEN REVOCABLE LIVING TRUST

15 **Parcel No./Tax ID:** 411-45-012

16 **Description:** LOT TWELVE (12), WHITE MOUNTAIN SUMMER
17 HOMES SUBDIVISION, ACCORDING TO THE PLAT OF RECORD
18 IN BOOK 9 OF PLATS, PAGES 22, 23, 24, IN THE OFFICE OF THE
19 COUNTY RECORDER AT NAVAJO COUNTY, ARIZONA.

20 **5.5** The real property, fixtures, and improvements located at 2008
21 SYCAMORE PL., SPRINGDALE, AR 72762.

22 **5.6** The real property, fixtures, and improvements located at 10508 PECAN
23 BR., SCHERTZ, TX 78154.

24 **5.7** The real property, fixtures, and improvements located at 3378
25 FLORLITA AVE., WEST VALLEY CITY, UT 84119.

26 **5.8** The real property, fixtures, and improvements located at 2590 W. ROBIN
27 RD., WEST VALLEY, UT 84119.

28 **6. Miscellaneous personal property, In Personam and/or In Rem:**

 All of the miscellaneous and personal property and interests up to the value of
 \$1,459,578, owned by, belonging to, or held for the benefit of the entities,
 companies or persons listed in **Item 1** above and their marital communities.

-Nothing Follows-

The foregoing instrument is a full, true and correct copy
of the original on file in this office.

Attest November 19 2019

JEFF FINE, Clerk of the Superior Court of the
State of Arizona, in and for the County of Maricopa.

By [Signature], Deputy Clerk